

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**AMBAC ASSURANCE CORPORATION'S INFORMATIVE MOTION**  
**REGARDING JUNE 3-4, 2020 OMNIBUS HEARING**

Ambac Assurance Corporation (“Ambac”) hereby submits this informative motion in compliance with the *Order Regarding Procedures for June 3-4, 2020, Omnibus Hearing* [ECF No. 13220<sup>2</sup>], and respectfully states as follows:

1. Andrew K. Glenn of Kasowitz Benson Torres LLP will appear telephonically at the June 3, 2020 Omnibus Hearing (the “Hearing”) and will be speaking on behalf of Ambac in connection with the *Motion of the Financial Oversight and Management Board Pursuant to Bankruptcy Code Sections 105(a) and 362 for Order Directing Ambac to Withdraw*

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

<sup>2</sup> “ECF No.” refers to documents filed in Case No. 17-BK-3283-LTS, unless otherwise noted.

*Complaint* [ECF No. 12569; ECF No. 756 in Case No. 17-3567] (the “Metropistas Motion”) as well as any and all objections, responses, statements, joinders, and replies to the Motion.

2. Atara Miller of Milbank LLP will appear telephonically at the Hearing and will be speaking on behalf of Ambac in connection with: (1) the *Motion of Assured Guaranty Corp., Assured Guaranty Municipal Corp., Ambac Assurance Corporation, National Public Finance Guarantee Corporation, and Financial Guaranty Insurance Company for Relief from the Automatic Stay, or, in the Alternative, Adequate Protection* [ECF No. 10102], (2) *Ambac Assurance Corporation, Financial Guaranty Insurance Company, Assured Guaranty Corp., Assured Guaranty Municipal Corp., and The Bank of New York Mellon’s Motion Concerning Application of the Automatic Stay to the Revenues Securing the CCDA Bonds* [ECF No. 10104], and (3) the *Amended Motion of Ambac Assurance Corporation, Financial Guaranty Insurance Company, Assured Guaranty Corp., Assured Guaranty Municipal Corp., and U.S. Bank Trust National Association, Concerning Application of the Automatic Stay to the Revenues Securing PRIFA Rum Tax Bonds* [ECF No. 10602]. Ms. Miller also will be available to address any issues concerning Ambac, other than the Metropistas Motion, that may arise at the Hearing.

3. Ms. Miller also reserves the right to be heard on any matter raised by any party at the hearing related to the Title III cases, or any adversary proceeding pending in the Title III cases, or the interests of Ambac.

WHEREFORE, Ambac respectfully requests that the Court take notice of the foregoing.

Dated: June 1, 2020  
San Juan, Puerto Rico

**FERRAIUOLI LLC**

By: /s/ Roberto Cámara-Fuertes

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By: /s/ Andrew K. Glenn

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***Attorneys for Ambac Assurance Corporation***

*[Remainder of Page Intentionally Omitted]*

**CERTIFICATE OF SERVICE**

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

/s/ Roberto Cámara-Fuertes

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